

ETEXT ATTACHMENT

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Service Employees International Union
1313 L Street, N.W.
Washington, DC 20005

January 5, 2004

Federal Election Commission
Reports Analysis Division
Attn: Alissa V. Sagri, Campaign Finance Analyst
cc: Antoinette Kitchen, Senior Reports Analyst

Re: Service Employees International Union Committee on Political Education (C00004036)
October Monthly report (9/1/03 - 9/30/03), et al

Dear Ms. Sagri:

This is in response to your information request dated December 3, 2003 concerning the above referenced report. You requested information about the difference between the year to date totals reported in column B for Lines 11 and 12 of our October Monthly Report compared to the prior months. Our review determined that all of the difference was explained by transactions from prior months that had been corrected in our detailed database but for which amended reports had not yet been filed. These transactions involved transfers from an affiliated federal PAC that had previously been incorrectly included in the unitemized totals. On December 31, 2003, we filed amended copies of each Form 3x filed for periods in 2003. As some of the individual transactions being corrected occurred in the first period of the year, this allows the year to date totals in each amended report to avoid any similar roll-forward error.

We discovered a similar problem in the reports for 2001 and 2002 where certain transfers received from affiliated committees were not correctly reported on Line 12. To correct this, we submitted amended reports for all of the periods in 2001 and 2002 (some of these amendments were filed on 12/31/03 and the others on 1/2/04).

As we have indicated in previous filings and correspondence, our computer software had not allowed us to file amended reports for the periods prior to 2003 in the new format now required by the FEC. We have since switched to a new computer software program and recreated the previously reported transactions in the current software's database. Therefore, these amended reports include the edits or corrections explained previously. These amendments include the items discussed in:

- our letter of 11/7/03 responding to your request dated 10/8/03 concerning the June 2003 Monthly Report
- our letter of 11/7/03 responding to your request dated 10/8/03 concerning the July 2003 Monthly Report. As a result of additional information learned after our 11/7/03 response was submitted, the amended report shows the 6/17/03 contribution to Friends of Schumer as relating to the 2004 general election. Although we had previously indicated that we would seek a refund for that contribution, we discovered that the campaign had notified us of the corrected designation prior to the date when the original report was filed and it should have been correctly designated at that time.
- our letter of 6/25/03 responding to your request dated 5/14/03 concerning the October 2002 Monthly Report
- our letter of 12/31/02 responding to your request dated 11/20/02 concerning the July and August 2002 Monthly Reports

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- our letter of 10/22/02 responding to your request dated 9/11/02 concerning the April 2002 Monthly Report
- our letters of 6/25/03 and 11/18/03 responding to your request dated 5/14/03 concerning the amended 30 Day Post-General Report for 2002;
- our letter of 3/22/02 responding to your request of 2/2/02 concerning the 2001 Mid Year Report
- our letter of 11/18/03 and amended report filed 11/24/03 responding to your request dated 6/19/02 concerning the 2001 Year-End Report

I believe we have now responded to all of the issues raised in your requests and have carried out all the amendments mentioned in previous responses. Please call me at 202-898-3465 if you have any further questions on these matters.

Sincerely,
John J. Sullivan
Associate General Counsel
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